

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

CHANDELLE A. CHAVEZ,

Plaintiff,

vs.

**No. 17-CV-813 JAP/SCY**

CITY OF ALBUQUERQUE d/b/a FAMILY AND  
COMMUNITY SERVICES DEPARTMENT,  
DOUGLAS CHAPLIN in his personal and official capacity,  
ELLEN BRADEN, in her personal and official capacity, and  
ANDREW QUINTANA, in his personal and official capacity.

Defendants.

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Defendants, City of Albuquerque and Douglas Chaplin, Ellen Braden and Andrew Quintana by and through counsel of record, German•Burnette & Associates, LLC, by Jason M. Burnette and Plaintiff, by and through counsel of record, Freedman Boyd Hollander Goldberg Urias & Ward, by Vincent J. Ward, and Law Offices of Nicholas T. Hart, by Nicholas T. Hart, hereby request that this Court grant their Joint Motion to Dismiss Plaintiff's Complaint with Prejudice. As grounds therefore, the parties state that they have resolved all issues in dispute in this matter, and they wish to have this matter dismissed with prejudice.

WHEREFORE, the parties pray the Court enter an Order dismissing with prejudice any and all causes of action Plaintiff did bring or could have brought against Defendants City of Albuquerque and Douglas Chaplin, Ellen Braden and Andrew Quintana and for what other relief is just and proper.

Respectfully submitted,

*CITY OF ALBUQUERQUE*

Esteban A. Aguilar, Jr., City Attorney

Approved on January 25, 2019

By: Melissa M. Kountz

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/s/ Jason M. Burnette

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*Freedman Boyd Hollander Goldberg*

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Approved on January 29, 2019

/s/ Vincent J. Ward

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*Law Offices of Nicholas T. Hart*

Approved on January 29, 2019

/s/ Nicholas T. Hart

NICHOLAS T. HART

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 30th day of January, 2019, I filed the foregoing electronically through the CM/ECF system, which caused counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Jason M. Burnette

JASON M. BURNETTE